

Appendix 6

Dinnseanchas and Solastalgia Planning Review

Curraghinalt Project

Introduction & Background

1. In sections 12.1 and 12.2 of its transboundary representation, An Taisce references the PAC's consideration of dinnseanchas at Doraville and indicates that both concepts of dinnseanchas and solastalgia are material considerations for the project given its magnitude and location. It asserts that the impacts would most certainly negatively affect sense of place and connection to the land in an Area of Outstanding Natural Beauty and cultural importance, leading to probable ecological grief. See Appendix 1 for Legal Submissions.

Dinnseanchas

2. The Introduction of the August 2015 Background Report to the Northern Ireland Regional Landscape Character Assessment (NIRLCA) refers to dinnseanchas as follows:

*The NIRLCA aims to draw together information on people and place, and the combinations of nature, culture and perception which make each part of Northern Ireland unique. This local identity can be referred to by the Irish term **dinnseanchas**, meaning the spirit of a place. This spirit results from the interactions of natural and human processes over time – processes which continue today since landscape must be viewed as a dynamic entity.*

3. This is the only reference to the term in the report. There are no further references to spirit or spirit of place beyond this paragraph. There are, however, four references to sense of place, including a cross reference to the Landscape Institute and Institute for Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment. Third Edition. Routledge. p.156 (GLVIA)¹. The term is defined in Table 7.3 of the NILCA as local distinctiveness and identity that make a particular landscape unique.
4. Paragraph 2.11 of GLVIA, on the importance of landscape, notes that particular attention needs to be given to landscape because of the importance that is attached to it by individuals, communities and public bodies.
5. It continues: *Landscape is important because it provides:*

¹ GLVIA's glossary defines 'Key Characteristics' as Key characteristics as: Those combinations of elements which are particularly important to the current character of the landscape and help to give an area its particularly distinctive sense of place. Paragraph 2.11 notes that landscape is important because it provides (inter alia) ☐ a shared resource which is important in its own right as a public good; ☐ an environment for flora and fauna; ☐ the setting for day to day lives – for living, working and recreation; ☐ opportunities for aesthetic enjoyment; ☐ a sense of place and a sense of history, which in turn can contribute to individual, local, national and European identity;

6. *a shared resource which is important in its own right as a public good;*
7. *an environment for flora and fauna;*
8. *the setting for day to day lives – for living, working and recreation;*
9. *opportunities for aesthetic enjoyment;*
10. *a **sense of place** and a sense of history, which in turn can contribute to individual, local, national and European identity;*
11. *continuity with the past through its relative permanence and its role in acting as a cultural record of the past;*
12. *a source of memories and associations, which in turn may contribute to wellbeing;*
13. *inspiration for learning, as well as for art and other forms of creativity.*

In addition landscape provides economic benefits, both directly by providing an essential resource to support livelihoods, especially in agriculture, forestry and other land management activities, and in recreation and tourism, as well as indirectly through its now widely acknowledged benefits for health and wellbeing.

14. Sense of place is also referenced in Historic Environment Division's Conservation Principles: Guidance for the sustainable management of the historic environment in Northern Ireland (January 2023). The introduction notes that '*Our historic environment is central to Northern Ireland's cultural heritage, providing us with a **sense of place**, identity and wellbeing. It is a resource to be protected, conserved and, where possible, enhanced for the benefit of present and future generations.*'
15. Paragraph 7.25 notes that:

*While physical heritage assets offer clear and obvious insight to our past, the historical treatment and naming of the landscape, place names and townlands, also gives a **sense of place** and identity that is deeply embedded in our society, local culture and traditions. Intangible cultural heritage is an equally important part of the heritage interest and identity.*
16. HED's Guidance on Setting and the Historic Environment (February 2018) notes that when assessing the impact of change on setting it is important, among other factors, to include analysis of the effect of the proposed change on qualities of the existing setting, such as sense of remoteness, evocation of the past or specific events, interactions with the surrounding area and other assets, sense of place, cultural identity and spiritual responses.
17. IEMA's Principles of Cultural Heritage Impact Assessment In The UK (April 2021), when considering cultural heritage and why it matters, notes that:

1.2 Cultural heritage connects people with place and includes the associations that can be seen, felt and heard. It is a source of memories and associations, and an inspiration for learning and creativity. Cultural heritage contributes to individual, community and national identity as well as our well-being and economic prosperity.

1.3 Our valued cultural heritage is a resource worthy of protection. This is recognised in government policy and legislation that seeks to safeguard and maintain the most important cultural heritage assets. Safeguarding the cultural significance of places and objects need not prevent change.

18. Sense of place is also a familiar term in planning that informs and features in various planning policy documents. There are 11 references to it in the Regional Development Strategy (RDS), five in the Strategic Planning Policy Statement (SPPS) and seven in Fermanagh Omagh District Council's (FODC) Plan Strategy (see Annex 1 for selected references).

19. Paragraph 2.1 of the SPPS directs planning authorities to simultaneously pursue social and economic priorities alongside the careful management of our built and natural environments for the overall benefit of our society. Paragraph 2.2 notes that creating places where communities flourish and enjoy a shared sense of belonging, both now and into the future, is fundamentally what planning is about. It goes on to identify economic growth as a key dimension of sustainable development for Northern Ireland and makes it clear that:

*This requires the planning system to continue to provide protection to the things we cherish most about our built and natural environment, including our heritage assets **while** unlocking development potential, supporting job creation and aiding economic recovery for the benefit of all our people.*

20. The quality of our environment, particularly our natural environment and cultural/built heritage are essential aspects of our sense of place, belonging and identity, and planning policy is protective of most sensitive and highly valued places and features but it is the purpose of the planning system to reconcile this with unlocking economic benefit.

21. The Ministerial Foreword to the SPPS emphasises the importance of certainty in planning:

'In planning I believe there is a need for greater certainty. I want certainty in terms of timescales for processing applications and importantly, certainty in terms of the planning policy context within which applications are submitted, so that stakeholders will know what is likely to be acceptable or not.'

22. LDPs are important to providing certainty to stakeholders – applicants and communities alike – about what is likely to be acceptable or not. Paragraph 5.7 of the SPPS picks up on the theme as follows:

An efficient and effective plan-led system provides confidence and certainty. Councils must prepare effective, up-to-date and relevant LDPs in accordance with the plan-led system. LDPs should set out a long-term spatial strategy and provide robust operational policies that provide certainty and transparency for all users of the planning system. Plans should be evidence-based and informed by meaningful participation with all relevant stakeholders. While LDPs present a clear sense of direction, they should also be adaptable to change.

23. It is reasonable, therefore, to look to the Plan Strategy to help identify the landscape and cultural places and features which are important to sense of place/dinnseanchas and an understanding of how economic development, such as minerals development, can be delivered.

24. An Taisce highlights the project's location in an Area of Outstanding Natural Beauty and cultural importance. It is also important to recognise that the characteristics of the AONB which contribute to its sense of place include its geological interest.
25. Paragraph 5.41 of the FODC PS acknowledges the Sperrin AONB as an essential aspect of sense of place, belonging and national and community identity. It goes on to note that the designation seeks to protect and enhance natural beauty whilst also recognising the needs of the local community and economy. Paragraphs 5.42 and 5.43 list out the characteristics of the AONB, noting that it is an area of outstanding geological interest, including resources of gold and other valuable minerals, and at the same time, scenically, the area has much to offer, it contains stretches of intact blanket bog and many examples of distinctive archaeological features.
26. Clearly the geological interest of the area forms part of its overall character and interest. Critically, as set out in the Applicant's SoC, the LDP's mineral strategy and policy supports the extraction of valuable minerals, even within the AONB, subject to criteria being met, because minerals can only be extracted from where they are located. Planning policy recognises that this type of development will have particular impacts, therefore, the test is whether the impacts are unacceptably adverse, taking account of design and mitigation measures.
27. The AONB designation is considered extensively in the applicant's main Statement of Case (SoC) and Rebuttal Statement (RS), as well as in Technical Report (TR) 13 and Rebuttal Report (RR) 13. The latter reports were authored by [REDACTED] from LUC who was a co-author of the NIRLCA that identified the dinnseanchas term. [REDACTED] identifies mining references in both the DAERA AONB description and the emerging AONB Management Plan that complement the Council's multi-layered characterisation of the features of the AONB that collectively contribute to its sense of place and identity.
28. As discussed extensively in the applicant's submissions, the landscape and visual impact of the project is localised and concentrated in a different part of the AONB to the wild, tranquil, uplands – key sites within the expansive AONB that are further protected by Special Countryside Area (SCA) status. The site is largely improved grassland and the surrounding area is characterised by a considerable concentration of permanent roadside development. Its location is in a lower lying, more developed, less wild and less tranquil part of the AONB. In TBR13 [REDACTED] notes that the proposed development will not significantly affect the Glenelly Valley area or any of the other areas specifically identified in the AONB description, which includes locations with noteworthy literary and cultural associations.
29. It is, however, recognised that even after mitigation, there will be residual landscape and visual effects, which must be expected in the case of a regionally significant mining project such as this. These effects include impacts that will, to some extent, affect the sense of place of the immediate locality, but because of the considerable concentration of roadside development which detracts from any feeling of wilderness in this locality (Commissioner Boomer in wind turbine planning appeal 2012/A0010; see SoC para 4.63), they do not reach the threshold of unacceptably adverse (in MIN01 terms).
30. In terms of sense of place derived from cultural heritage, objectors highlight the cultural significance of the Beaghmore ASAI, a Mass Rock and the 'Green Road/Flight of the Earls'. The significance and potential impacts of the development upon each of these is addressed in 2.1, 2.2 and 2.3 of TR15. The ASAI extends into the application site but there is no overground

development proposed within it. There is no record or evidence to support a mass rock adjacent to the site boundary. Evidence accepted by the Judge in a County Court case demonstrated that the 'historic road' was constructed some 150 years after the Flight of the Earls.

31. Further commentary on intangible cultural heritage and the wider cultural landscape of Munitir Lunigh is provided in Section 3.2 of RR15 and TBR15. The proposal is not contrary to HE01 which is the operational policy designed to protect cultural heritage assets, including their contribution to sense of place.
32. The characteristics of today's Munterloney is described in Appendix 2 of the Gravis SoC on behalf of Supporters. The Social Value from Dalradian Curraghinalt Mine' report prepared by the Future Funding Scoping Group, as well as emphasising the great historic continuity of the communities in the area, and the importance of its culture, describes its current challenges and sets out its ambition to tackle rural decline, deprivation and disadvantage to reverse 'the habit of going away.'
33. Finally, upon review of the evidence base, as contained in the respective ES's, LVIAs, Cultural Heritage Assessments and consultation responses, the project is clearly distinguishable from Doraville, the refusal of which does not justify a similar finding on dinnseanchas. The nature of the proposal is fundamentally different, as is the sensitivity of the location (see Annex 3 for further details). The Doraville Commissioner's assessment was in respect of the 'widespread negative implications for the character, heritage and appearance of this part of the Sperrins AONB' (13.7 bullet 4) but as noted in the applicant's Mine RS para 3.88 (i), the area around the subject application site is characterised by coniferous forestry, lower land with field boundaries and numerous instances of dwellings and associated buildings – consistent with similar a similar analysis by the PAC in appeal 2012/A0010.

Solastalgia

34. Solastalgia is understood to mean ecological grief, or more broadly distress about environmental change. The representations often refer to dinnseanchas and solastalgia, and it follows that if there is an adverse effect on the former, it could result in the latter. See TR19, RR19 and TBR19 for the applicant's submissions on health impacts. Dr [REDACTED] notes that solastalgia is not a health outcome but a term to frame an emotional response or distress caused by unwanted environmental change.
35. Paragraph 4.3 of the SPPS states that the planning system has an active role to play in helping to better the lives of people and communities in Northern Ireland. Paragraph 4.4 notes that it is widely recognised that well designed buildings and successful places can have a positive impact on how people feel. Paragraph 4.5 identifies (inter alia) supporting the provision of jobs, services and economic growth as a way in which planning authorities can contribute positively to health and well-being. Paragraph 4.10 states that the natural and heritage assets of the countryside and coast need to be recognised for the contribution they make to enhancing human health and wellbeing. It goes on to state that conserving and, where possible, enhancing these environments as well as promoting their appropriate use, accessibility and connectivity is key to securing their sustainable upkeep.
36. As noted in paragraph 4.144 of the applicant's SoC, the SPPS (para 6.148) confirms that the Government supports the responsible exploitation of minerals and that sustainable development

does not prevent us from using and capitalising on our natural mineral resources (para 6.149). The role of the planning system is to address the challenges that arise from this type of significantly beneficial form of development (para 6.150).

37. After mitigation, the assessments that have been undertaken for the project have identified limited harm, but this is outweighed by the very substantial economic benefits of the project. Like the landscape, people are also dynamic (and adaptable) but if the project secures the necessary permissions and is delivered, as planned, it is accepted that those opposed to it may feel aggrieved or distressed by its construction, operation and, indeed, its presence because of the limited harm caused. Paragraph 5.2 of the SPPS acknowledges that the planning process may not always be able to reconcile competing interests.
38. The applicant is committed to delivering and operating responsibly. In this context, the applicant recognises that the provision of information and communication before and during the construction phase, throughout the operational phase and before and during the decommissioning phase of the project provides understanding, and therefore has the potential to influence perceptions of the project and, ultimately, how people feel about it. Therefore, the applicant will continue with its practice of providing information about activity with the project to addresses within the locality (and on its website) regularly and prior to key milestones. This is action that the company's community liaison team has been doing on an *ad hoc* basis since 2015 through its distribution of project newsletters to around 3,700 addresses within a radius of around 12.5 km from Greencastle crossroads (addressees can elect to opt out). Other communications include regular posting across social media platforms.

Contact

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